

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

-----X

In re:	PROMESA Title III
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	
as representative of	No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>	(Jointly Administered)
Debtors. ¹	

-----X

**STATEMENT OF THE LAW OFFICES OF ANDRÉS W. LÓPEZ, P.S.C. IN RESPONSE
TO THE ORDER TO SHOW CAUSE REGARDING NON-COMPLIANCE WITH THE
PUERTO RICO RECOVERY ACCURACY IN DISCLOSURES ACT AND THE
COURT’S ORDERS RELATED THERETO**

TO THE HONORABLE COURT:

NOW COMES Andrés W. López, Esq., appearing on behalf of The Law Offices of Andrés W. López, P.S.C., and respectfully submits this statement in response to the Court’s *Order to Show Cause Regarding Non-Compliance with the Puerto Rico Recovery Accuracy in Disclosures Act and the Court’s Orders Related Thereto* (Docket Entry No. 21902 in Case No. 17-3283).

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. On August 23, 2022, the Court issued an Order to Show Cause requiring a group of twelve professionals, including the undersigned, to show cause why the Court “should not deny future applications for payment of fees and reimbursement of expenses.” (Docket Entry No. 21902 in Case No. 17-3283.) The Court granted the professionals until August 30, 2022 at 5 p.m. (Atlantic Standard Time) to respond to its Order.
2. The Law Offices of Andrés W. López, P.S.C. appears as a Retained Professional in the Amended Material Interested Parties List approved by the Court. (Docket Entry No. 20458 in Case No. 17-3283.)
3. The undersigned was retained by the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) on July 31, 2017 and appeared before the Court in the following Title III cases: (1) Commonwealth of Puerto Rico (Case No. 17-3283); (2) Puerto Rico Sales Tax Financing Corporation (Case No. 17-3284); (3) Puerto Rico Highways and Transportation Authority (Case No. 17-3567); and (4) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Case No. 17-3566).
4. On February 26, 2018, the Court granted the undersigned’s requests to withdraw as counsel for AAFAF. (Case No. 17-3283, Docket Entry 2593; Case No. 17-3284, Docket Entry 259; Case No. 17-3566, Docket Entry 253; Case No. 17-3567, Docket Entry 405.)
5. The Law Offices of Andrés W. López, P.S.C. has timely submitted all requests for legal fees and expenses stemming from the undersigned’s legal representation of AAFAF in the Title III cases. The fee examiner reviewed the submissions and recommended that

- the Court approve them. In March and June 2018, the Court issued Orders allowing the fee and expense requests.
6. AAFAF has paid all invoices to The Law Offices of Andrés W. López, P.S.C., as approved by the Court.
 7. The Law Offices of Andrés W. López, P.S.C. has no outstanding balances, invoices, or fee applications pending payment regarding its legal representation of AAFAF before the Court.
 8. Over the past four and a half years, The Law Offices of Andrés W. López, P.S.C. has not provided any legal services to AAFAF in any Title III case (or any other matter).
 9. The Law Offices of Andrés W. López, P.S.C. does not anticipate filing any future applications for payment of fees and reimbursement of expenses to the Court for these cases.
 10. If The Law Offices of Andrés W. López, P.S.C is in the future engaged to perform additional work for AAFAF in these Title III cases, it will file any disclosures required by the Puerto Rico Recovery Accuracy in Disclosures Act ("PRRADA").

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of August 2022.

I HEREBY CERTIFY: That on this same date, the foregoing has been electronically filed with the Clerk of the Court using the CM/ECF system, which will notify all counsel of record of such filing.

**THE LAW OFFICES OF
ANDRÉS W. LÓPEZ, P.S.C.**

902 Fernández Juncos Ave.

San Juan, PR 00907

Telephone: (787) 294-9508

Email: andres@awllaw.com

/s/Andrés W. López

Andrés W. López, Esq.

USDC-PR Bar No. 215311